

REMARKS

Claims 2 and 4-7 remain pending in the present application. Claim 7 has been amended in this Response. No new matter has been introduced by this Response, therefore, entry and consideration are respectfully requested.

Claims 4 and 6-7 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Davis et al. (U.S. Patent No. 4,436,962, hereafter "*Davis*") in view of Herrick et al. (U.S. Patent No. 5,521,970, hereafter "*Herrick*"). Claims 2 and 5 stand rejected under 35 U.S.C. §103(a) as being unpatentable over *Davis* in view of *Herrick*, and further in view of Brown et al. (U.S. Patent No. 5,309,028, "*Brown*"). The Applicants traverse the above rejections for the following reasons.

I. Response To Claim Rejections

In the Office Action, the Examiner relies on *Davis*, *Herrick* and *Brown* to teach or suggest each an every element as recited in the claims of the present invention. To expedite prosecution, the Applicants have herein amended independent claim 7 to more clearly distinguish the present invention from the cited prior art. Specifically, the prior art, alone or in combination, does not teach or suggest at least two critical features recited in claim 7 (as amended). First, assigning a plurality of subscriber lines to a call acceptance group, wherein the plurality of subscriber lines include subscriber terminals located among a plurality of the multiple communications systems. Second, maintaining call answering capability for all subscriber terminals associated with the call acceptance group after the transfer of an incoming call.

A. Davis Reference

In the Office Action (page 3), it has been conceded by the Examiner that *Davis* does not teach or suggest at least the first feature of the present invention noted above. Specifically, the Examiner states that "it can be seen that *Davis* lacks the limitations specifying encompassing multiple communication systems and assigning the plurality of subscriber lines to a call acceptance group among a plurality of the multiple communication systems." It logically follows, therefore, that *Davis* fails to teach or suggest the second feature of the present invention noted above, as well (i.e., "maintaining call answering capability for all subscriber terminals associated with the call acceptance group after the transfer of the incoming call"). Accordingly, *Davis* clearly fails to teach or suggest all the features recited in claim 7, as amended.

B. Herrick Reference

In the Office Action (pages 4-6), the Examiner relies on *Herrick* for overcoming the deficiencies noted above in *Davis* and maintaining the §103 rejections to claims. However, the Applicants suggest that claim 7 is now clearly distinguishable from *Herrick*.

First, the system in *Herrick* does not address *assigning subscriber lines to a call acceptance groups, wherein the subscriber lines include subscriber terminals located among a plurality of the multiple communications systems*. Instead, *Herrick* deals with redirecting calls to endpoints or terminals between two PBX systems. Specifically, *Herrick* teaches in FIG. 1 that each PBX 10, 20 serves its own complement of communications endpoints or terminals 11, 12, 21, 22; and each PBX 10, 20 utilizes a plurality of entries that identify different endpoints or terminals to which incoming calls are to be redirected (col. 3, lines 28-34). For example, when an incoming call is received by a PBX 10, a first entry 99 on a list of endpoints or terminals is accessed to determine the endpoint or terminal to which the call should be redirected. If the endpoint or terminal is local, then the connection of the call is handled conventionally by that PBX. However, if the endpoint or terminal is remote, then the connection of the call is controlled by the remote PBX 20 (see col. 3, line 51-col. 4, line 43).

Fig. 2 of *Herrick* further punctuates this point. In Fig. 2, a PDX 10 receiving an incoming call searches through its entries 99 on a list of endpoints or terminals and determines if an endpoint or terminal is remote or local. If remote (i.e., located in another PBX 20), the PBX 10 relinquishes control over the call to another PBX 20, which is responsible for connecting the call to the appropriate endpoint or terminal. The other PBX 20 proceeds conventionally to find an available call coverage path for connecting the call. Accordingly, *Herrick* does not appear to assign endpoints or terminals to an acceptance group, let alone assign endpoints or terminals located in multiple communication systems to an acceptance group. Instead, *Herrick* simply goes through a list of available endpoints or terminals one at a time.

Second, *Herrick* fails to teach or suggest *maintaining call answering capability for all subscriber terminals associated with the call acceptance group after the transfer of an incoming call*. As noted above, when a local PBX transfers a call to a remote PBX, the local PBX relinquishes control of the call. In other words, no endpoint or terminal local to the transferring PBX would have the capability of answering the call, unless the call was subsequently transferred back to that PBX.

Conversely, the present invention is directed to an improvement on a team function approach for processing an incoming call that encompasses multiple communication systems. Using this approach, all subscribers terminals associated with the call acceptance group have the capability of answering an incoming call even after the successful transfer of the call. For example, in Fig. 1 the call acceptance group AUN1 includes subscriber terminals TE associated with each subscriber line S1T1, S2T2 and C1T1. Each of the terminals TE associated with the call acceptance group AUN1 has the ability of answering an incoming call.

C. Brown Reference

Brown fails to overcome the deficiencies noted above in *Davis* and *Herrick*. Accordingly, even if one of ordinary skill in the art were to combine the teachings of *Davis*, *Herrick* and *Brown*, the combination still would not teach or suggest all the features recited in independent claim 7. In particular, the cited prior art fails to teach or suggest “assigning a plurality of subscriber lines to a call acceptance group, wherein the plurality of subscriber lines are located among a plurality of the multiple communications systems;” and “maintaining call answering capability for all subscriber terminals associated with the call acceptance group after the transfer of an incoming.”

Therefore, independent claim 7 is believed to be clearly distinguishable over *Davis*, *Herrick* and *Brown*, individually or in combination. Likewise, dependent claims 2 and 4-6 are also believed to be clearly distinguishable over *Davis*, *Herrick* and *Brown*, individually or in combination, based on their respective dependencies from claim 7.

II. Conclusion

In light of the above, the Applicants respectfully submit that the present claims are both novel and non-obvious over the prior art of record. Accordingly, the present application is in condition for allowance and requests that a timely Notice of Allowance be issued in this case. If any additional fees are due in connection with this application as whole, the office is hereby authorized to deduct said fees from Deposit Account No. 021818. If such a deduction is made, please indicate the attorney docket number (112740-187) on the account statement.

Respectfully submitted,

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